

REMARKS

This application has been carefully studied and amended in view of the Office Action dated July 20, 2009. Reconsideration of that action is requested in view of the following.

Reconsideration is respectfully requested of the rejection of the claims under 35 USC 112 with regard to the claims defining the flange and thread as being a one piece unit constituting new matter. Independent Claims 1 and 15 have now been amended to define "said flange bearing a thread on its periphery obtained directly by injection moulding" and to define "said flange and said thread being integral with each other to consist of a one piece unit". This recitation of the relationship between the flange and the thread is fully and clearly supported by the Specification. For example, page 11, lines 23-26 state "The monolayer flange (3) was produced by injection-moulding...bearing a thread (8) obtained directly by injection-moulding". This means that the flange has its thread obtained directly when the flange itself is being injection moulded. As a result the flange and thread would consist of a one-piece unit. Moreover, Figures 1, 2 and 3 show the flange and thread to be part of the same one-piece unit. As indicated above, independent Claims 11 and 15 have been amended with regard to defining the one-piece relationship between the flange and the thread. The language used is taken directly from page 11 of the Specification. In addition, page 11 of the Specification has been amended to refer to what is illustrated in Figures 1-3 with regard to the flange and thread consisting of a one-piece unit. This addition to the Specification likewise does not constitute new matter. For example, as stated in MPEP 608.04 "In establishing a disclosure, applicant may rely not only on the specification and drawing..." Similarly, MPEP 604(a) states "Matter not in the original specification, claims or drawings is usually considered new matter". The import of both of these sections from the MPEP is that support may be found in the drawings. Thus, as illustrated in Figures 1-3 there is support for the "one-piece unit".

It is respectfully submitted that the claims are patentable over Kleppner in view of Stangier and are parentable over Stangier in view of Kleppner. The present invention as defined in parent Claim 1 and in parent Claim 15 relates to an injection-moulded plastic flange which has

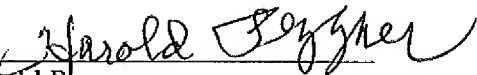
a thread on its periphery. Thus, the flange itself is threaded at the periphery. Accordingly, as defined in these claims the flange and thread are integral with each other and consist of a one-piece unit.

Clearly Kleppner does not disclose a thread on the periphery of the flange. The deficiencies of Kleppner are not overcome by Stangier. In that regard Stangier teaches a flange for a hollow body made of two parts: (1) holding cover 316 and (2) nail screw thread ring 358. Thus, Stangier also does not disclose a one-piece member which consists of the flange and thread being integral with each other. This difference in structure is clearly apparent from Figure 6 of Stangier where the threaded ring 358 is separate and distinct from other elements, including the cover 316.

The flange, according to the invention which directly bears a thread makes it possible to be fixed tightly using only two additional pieces, namely a ring with a complementary ring and seal. In contrast, the flange of Stangier (holding cover 16) requires three additional pieces, namely the ring 358, the union or cap nut 356 and the seal 334. Moreover, the mounting solution of Stangier requires a connecting portion (item 12, 112, 212, 312 depending on the figure) to be molded in one piece with the tank wall which is precisely what the present invention does not require. In other words, a combination of Kleppner and Stangier still does not result in, nor make obvious, the present invention wherein the flange itself is threaded. Instead, any reasonable combination of Kleppner and Stangier would result in a multiple part system including a flange without a thread and a ring, as a separate piece, bearing a thread.

In view of the above remarks and amendments it is respectfully requested that this application should be passed to issue.

Respectfully submitted,

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